

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION

Simbarashe Gwisai,
Plaintiff,

v.

Jeremiah Peter (display name: Common Sense With Sall),
Defendant.

Case No.:
JURY TRIAL DEMANDED

COMPLAINT FOR COPYRIGHT INFRINGEMENT

Plaintiff, proceeding pro se, alleges:

I. JURISDICTION AND VENUE

1. This is a civil action for copyright infringement under the Copyright Act, 17 U.S.C. § 101 et seq.
2. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).
3. Venue is proper under 28 U.S.C. § 1391 and § 1400(a) because the Plaintiff resides in this district and the harm occurred within this district.

II. PARTIES

4. Plaintiff, Simbarashe Gwisai, is an individual residing at 1057 Wylin Ct, Ferguson, MO 63135, and may be reached at (314) 5668534 or simbagwisai@gmail.com.
5. Defendant, Jeremiah Peter, who operates under the YouTube name “Common Sense With Sall,” resides at 13 Tosla Street, Ijegin Imore, Satellite Town, Lagos 102102, Nigeria.

III. STATEMENT OF CLAIM

6. Plaintiff is the original creator and copyright owner of edited and narrated video content published on the YouTube channels Court Watchers and Court Archives.
7. Although the source material is public court footage, Plaintiff created a transformative derivative work by selecting, editing, arranging, and providing original commentary and stylistic elements that reflect unique creative expression.
8. Defendant uploaded a video containing long, unaltered segments taken directly from Plaintiff’s

edited work, including Plaintiff's commentary, visual edits, and presentation style, without permission or license.

9. This use was unauthorized and infringes Plaintiff's exclusive rights under 17 U.S.C. § 106.

10. YouTube has removed the infringing video but informed Plaintiff that unless court action is shown within 10 business days, the video may be reinstated.

IV. RELIEF REQUESTED

Plaintiff respectfully requests that the Court:

- a. Declare Defendant's actions as copyright infringement;
- b. Issue a temporary and permanent injunction prohibiting further use or distribution of the infringing content;
- c. Award statutory or actual damages as allowed by law;
- d. Grant any other relief the Court deems just and proper.

Respectfully submitted,

Dated: April 14, 2025
Simbarashe Gwisai
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